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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

JANET GARCIA, GLADYS  
ZEPEDA, MIRIAM ZAMORA, ALI  
EL-BEY, PETER DIOCSON JR,  
MARQUIS ASHLEY, JAMES  
HAUGABROOK, individuals,  
KTOWN FOR ALL, an  
unincorporated association;  
ASSOCIATION FOR  
RESPONSIBLE AND EQUITABLE  
PUBLIC SPENDING, an  
unincorporated association,

Plaintiffs,

v.

CITY OF LOS ANGELES, a  
municipal entity; DOES 1-7,

Defendants.

CASE NO. 2:19-cv-06182-DSF-PLA

**DECLARATION OF CATHERINE  
SWEETSER**

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27 *Peter Diocson Jr., Marquis Ashley, Ali El-Bey, and*  
28 *Association for Responsible and Equitable Public*  
*Spending.*

**DECLARATION OF CATHERINE SWEETSER**

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3 1. My name is Catherine Sweetser. I am one of the attorneys for Plaintiffs in  
4 this action. I have personal knowledge of the facts contained in this declaration, and if  
5 called to testify, I could and would testify competently as to the truth of the facts in  
6 this declaration.

7 2. On June 30, 2020, I heard that there were signs posted on Rose Avenue in  
8 Venice that said that bulky items would be taken. In the evening on June 30, I drove  
9 to Rose Avenue to take a look at the signs and how they were placed around the  
10 people camping there.

11 3. There are people camping on an unpaved section of sidewalk next to the  
12 Penmar golf course on Rose between Frederick and Penmar. On the evening of June  
13 30, I found a sign posted on a pole next to a few tents. True and correct copies of my  
14 pictures of that sign as it appeared on June 30, 2020 are attached as **Exhibit A**.

15 4. I asked some people at the encampment whether they had heard anything  
16 about a July 1, 2020 clean up taking place on Rose. I was told by one unhoused  
17 person that a Los Angeles Sanitation worker had told them that bulky items would be  
18 taken on July 1, 2020. This person told me that he was moving his bicycle inside his  
19 tent so that it would not be taken during the clean up. Another person told me that a  
20 City employee had told them the same, although they did not know whether it was a  
21 Sanitation employee who had given them that information.

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1           5. Plaintiffs' attorneys emailed the City Attorney to say that people at the  
2 encampment had stated that they had heard about the bulky item clean up from City  
3 employees, together with a picture of the signs, on the evening of June 30, 2020. In  
4 that email, we requested that the City Attorney investigate and tell us whether the City  
5 intended to take bulky items at that encampment on July 1.

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7           I declare under penalty of perjury that the foregoing is true and correct.

8           Executed on August 17, 2020, in Los Angeles, California

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12           CATHERINE SWEETSER  
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# EXHIBIT A







